

**Federal Defenders
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January 28, 2021

BY EMAIL & ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

RE: United States v. Michael Avenatti
19 Cr. 374 (JMF)

Dear Judge Furman:

We write in response to the Court's Order dated January 8, 2021 adjourning trial in the above-captioned case to January 10, 2022. Pursuant to that Order, we confirm that Michael Avenatti is aware of the new trial date. Mr. Avenatti understands that this is a firm date and looks forward to this matter being adjudicated.

With respect to defense motions, we respectfully seek leave to file any applications by May 1, 2021, with responses due by June 1, 2021 and replies due by June 18, 2021. The defense is confident that this schedule leaves ample time to address the issues we anticipate raising without any effect on the trial date.

Respectfully Submitted,

_____/s/
Robert M. Baum
Tamara L. Giwa
Andrew J. Dalack
Assistant Federal Defenders

Cc: Government Counsel

Counsel for Michael Avenatti